

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARLOS MEDINA CENTENO
DEBTOR

CASE NO 16-04961-MCF

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

NOW COMES, CARLOS MEDINA CENTENO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1. The debtor is hereby submitting a proposed amended Plan, dated November 29, 2016, herewith and attached to this motion.
2. This proposed amended Plan is filed to increase the Plan base in order to cure the "insufficiently funded" issue raised by the Trustee in his unfavorable recommendation (docket #23).

WHEREFORE debtor respectfully requests the confirmation of the requested amended Plan, dated November 29, 2016.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor in the above captioned case, and to all creditors and parties in interest appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of November, 2016.

/s/ Roberto A. Figueroa Colón
ROBERTO A. FIGUEROA COLON
USDC #300105
FIGUEROA & SERRANO, PSC
PO BOX 1635
GUAYNABO PR 00970-1635
TEL. NO. (787) 744-7699

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

Case No. 3:16-bk-4961

MEDINA CENTENO, CARLOS

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: 11/29/2016																
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																
I. PAYMENT PLAN SCHEDULE <table> <tr><td>\$ 500.00</td><td>x 12</td><td>= \$ 6,000.00</td></tr> <tr><td>\$ 506.00</td><td>x 48</td><td>= \$ 24,288.00</td></tr> <tr><td>\$ _____</td><td>x _____</td><td>= \$ _____</td></tr> <tr><td>\$ _____</td><td>x _____</td><td>= \$ _____</td></tr> <tr><td colspan="2">TOTAL: \$</td><td>30,288.00</td></tr> </table>		\$ 500.00	x 12	= \$ 6,000.00	\$ 506.00	x 48	= \$ 24,288.00	\$ _____	x _____	= \$ _____	\$ _____	x _____	= \$ _____	TOTAL: \$		30,288.00	II. DISBURSEMENT SCHEDULE <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS:</p> <p><input type="checkbox"/> Debtor represents no secured claims.</p> <p><input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. Firstbank Puerto Ric Cr. _____ Cr. _____ # Claim 1-1 # _____ # _____ \$ 15,559.78 \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: 6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <p>I. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</p> <p>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executive contracts, payment of interest to unsecureds, etc.) * After confirmation of Plan Trustee will pay Firstbank PR (POC 1-1) concurrently with attorney's fees in a 50/50% basis; once attorney's fees are paid in full the Trustee will pay Firstbank PR (POC 1-1) ahead any other secured claim. * Debtor to provide Adequate Protection Payments to Firstbank Puerto Rico through the Trustee in the sum \$277 per month until confirmation, and to be paid retroactively since petition date. * Debtor to provide auto insurance (Eastern America Insurance Company) upon maturity to Firstbank Puerto Rico through Chapter 13 Plan. * Late filed claims filed by creditors will receive no distribution. * Debtor reserves the right to object claims after Plan confirmation. * ASUME: arrears (\$7,926.78) will be paid through the Trustee. Debtor to continue making current direct payments to ASUME.</p>	
\$ 500.00	x 12	= \$ 6,000.00																
\$ 506.00	x 48	= \$ 24,288.00																
\$ _____	x _____	= \$ _____																
\$ _____	x _____	= \$ _____																
TOTAL: \$		30,288.00																
Signed: <u>/s/ CARLOS MEDINA CENTENO</u> Debtor Joint Debtor																		

Attorney for Debtor **Figueroa & Serrano, PSC**

Phone: (787) 744-7699

Label Matrix for local noticing

0104-3

Case 16-04961-MCF13

District of Puerto Rico

Old San Juan

Tue Nov 29 14:35:10 AST 2016

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

COOP. AGUADILLA

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FIRSTBANK PR

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SAN JUAN, PR 00908-0146

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San Juan, PR 00919-2830

CREDITONE, LLC

P.O. BOX 625

METAIRIE, LA 70004-0625

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AT&T/C/O Midland Bankruptcy

5407 Andrews Hwy

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Coop A/C Aguadilla

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Dish

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CONSUMER SERVICE CENTER

BANKRUPTCY DIVISION - CODE 248

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Island Finance

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CAGUAS PR 00725

LVNV Funding, LLC its successors and assigns
assignee of Citibank (South Dakota),

N.A.

Resurgent Capital Services

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Greenville, SC 29603-0587

LVNV Funding, LLC its successors and assigns
assignee of Household Bank (SB), N.A.

Resurgent Capital Services

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Greenville, SC 29603-0587

Liberty Cablevision of PR

PO Box 192296

San Juan, PR 00919-2296

MIDLAND FUNDING LLC

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Warren, MI 48090-2011

Midland Funding

2365 Northside Dr

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(p)SPRINT NEXTEL CORRESPONDENCE

ATTN BANKRUPTCY DEPT

PO BOX 7949

OVERLAND PARK KS 66207-0949

Synchrony Bank

c/o of Recovery Management Systems Corp

25 S.E. 2nd Avenue, Suite 1120

Miami, FL 33131-1605

ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS CHAPTER 13 TRUS

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End of Label Matrix	
Mailable recipients	25
Bypassed recipients	0
Total	25